



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW  
ATLANTA, GEORGIA 30303-8909

SITE: Terrell Drive  
BREAK: 1.9  
OTHER: V4

February 5, 1998

Mr. Rick Hogan  
Commonwealth of Kentucky  
Natural Resources and Environmental Protection Cabinet  
Department for Environmental Protection  
Frankfort Office Park  
14 Reilly Road  
Frankfort, Kentucky 40601

SUBJ: Focused Site Inspection Report  
Terrell Drive Dump KYD980839849  
Danville, Boyle County, Kentucky

Dear Mr. Hogan,

Please address the following comments regarding the above referenced report.

1. The surface water pathway still has not been adequately addressed. Sample TD-03 does not accurately characterize the upstream background conditions of Clark's Run Creek because it was not collected upstream of the fill area of the dump. According to the topographic contours represented in Figure 2 from the Dynamac SIP report, the fill area extends ~380 feet (1 inch at a 1:4600 scale) East of the maintenance garage. Per Figure 2 of this report, sample TD-03 was collected due South of the maintenance garage. This sample point is well within the influence of historic or current runoff and/or leachate outbreaks of the ~380 feet of fill upstream of the sample point. Therefore, any conclusions regarding elevated (3 times background) contaminant levels downstream of the site are not valid and the absence or presence of an observed release has not been documented. The site still requires additional sampling. Please allow EPA to review your sampling plan prior any additional field work.

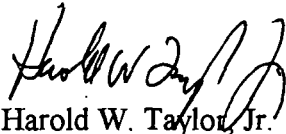
2. The report is inconclusive regarding the ultimate disposition of the drums that were unearthed in 1980. The report states that the site "was not properly closed until 1986". There is no reference presented that verifies this information. What does "properly closed" mean? Were the drums removed? Is there an engineering report of the closure activities? Please provide references that will expand upon and verify these facts.



3. The report states that "all access points to the creek were inspected...". Where were these access points? How far downstream of the site were the access points inspected? Is there a logbook documenting this? The report states that "the stream is too shallow to fish until it forms a cove in Herrington Lake..." and a point is marked on the topo map "begin fishery". Please include the reference that was used to determine these facts.
4. No HRS score was included with the report to support the conclusions and recommendations. Please submit a revised report that includes (under separate cover) a SI Method or Prescore that incorporates **all** of the above comments.

If you have any questions regarding these comments, please contact Loftin Carr at (404)562-8804.

Sincerely,



Harold W. Taylor, Jr.  
Chief, KY / TN Site Management Section